

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

**FEIN, SUCH, KAHN & SHEPARD, P.C.**

Counsellors at Law

7 Century Drive - Suite 201

Parsippany, New Jersey 07054

(973) 538-9300

Attorneys for Secured Creditor

Select Portfolio Servicing, Inc., as

servicer for DEUTSCHE BANK NATIONAL

TRUST COMPANY, AS TRUSTEE FOR LONG

BEACH MORTGAGE LOAN TRUST 2006-WL2,

ASSET-BACKED CERTIFICATES, SERIES

2006-WL2

JILL A. MANZO, ESQ.

739SCM

bankruptcy@feinsuch.com

In Re:

JOEL W SAPERSTEIN

Debtor(s).

Case No.: 19-17450-SLM

Adv. No.:

Chapter: 13

Hearing Date: n/a

Judge: Honorable Stacey L. Meisel

**OBJECTION OF SELECT PORTFOLIO  
SERVICING, INC. TO DEBTOR'S  
REQUEST FOR LOSS MITIGATION**

I, JILL A. MANZO, ESQ. , do hereby certify as follows:

1. I am an attorney at law of the State of New Jersey associated with the law firm of FEIN, SUCH, KAHN & SHEPARD, PC, attorneys for **SELECT PORTFOLIO SERVICING, INC.**, ("Secured Creditor" herein), and I am fully familiar with the facts and circumstances of the within matter.

2. Secured Creditor holds a mortgage on Debtor's residence which is located at 708 WINDSWEPT LANE, FRANKLIN LAKES, NJ 07417 As

of the date of the bankruptcy filing, Debtor was in default on the terms of the Note and Mortgage. Total arrears due to Secured Creditor are \$215,836.01 and total claim due at the time of filing was \$1,273,761.12. A copy of the Proof of Claim is on file with the Court.

3. The Debtor's instant case was filed on 04/12/2019.

4. Debtor filed the instant Application for Extension of Loss Mitigation on April 7, 2020 to which Secured Creditor respectfully objects for the reasons which follow:

(a) The Debtor has failed to submit a complete package to Secured Creditor at this time. The Debtor's original request for Loss Mitigation was filed on May 6, 2019. To date, Secured Creditor has been unable to complete a reviewd of the file as the Debtor has not submitted all the required documents despite several requests from Secured Creditor. Therefore, the Debtor is not fulfilling their obligations under the Loss Mitigation Procedures and allowing Loss Mitigation to continue would only result in an additional undue delay to Secured Creditor's ability to enforce their rights as per the terms of the Note and Mortgage.

5. For the reasons stated above, and for any others that the Court deems fit to adopt, Secured Creditor respectfully objects to Debtor's request for Loss Mitigation.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

**FEIN, SUCH, KAHN & SHEPARD, PC.**  
Attorneys for the Secured  
Creditor,

By: /S/JILL A. MANZO, ESQ.

DATED: May 10, 2019

cc: CAMILLE J KASSAR, ESQ. - DEBTOR(S)' ATTORNEY  
MARIE-ANN GREENBERG, ESQ. - TRUSTEE

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NATIONAL TRUST COMPANY, AS  
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LOAN TRUST 2006-WL2, ASSET-BACKED  
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#### CERTIFICATION OF SERVICE

1. I, TBD :

☐ represent the \_\_\_\_\_ in this matter.

☒ am the secretary/paralegal for FEIN, SUCH, KAHN & SHEPARD, P.C.,  
who represents the Secured Creditor, DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE FOR LONG BEACH MORTGAGE LOAN TRUST 2006-WL2,  
ASSET-BACKED CERTIFICATES, SERIES 2006 in this matter.

☐ am the \_\_\_\_\_ in the above case and am  
representing myself.

2. On TBD, This office caused to be mailed a copy  
of the following pleadings and/or documents to the parties listed

in the chart below:

- a. Objection to Application for Extension of Loss Mitigation

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
CAMILLE J KASSAR LAW OFFICES OF CAMILLE J KASSAR, LLC 271 ROUTE 46 WEST SUITE C-102 FAIRFIELD, NJ 07004	Debtor(s)' Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other: <u>Notice of Electronic Filing</u> (D.N.J. LBR 5005-1)
MARIE-ANN GREENBERG CHAPTER 13 STANDING TRUSTEE 30 TWO BRIDGES RD SUITE 330 FAIRFIELD, NJ 07004	Trustee in Bankruptcy	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other: <u>Notice of Electronic Filing</u> (D.N.J. LBR 5005-1)
U.S. TRUSTEE US DEPT OF JUSTICE OFFICE OF THE US TRUSTEE ONE NEWARK CENTER, STE 2100 NEWARK, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other: <u>Notice of Electronic Filing</u> (D.N.J. LBR 5005-1)
JOEL W SAPERSTEIN 708 WINDSWEPT LANE FRANKLIN LAKES, NJ 07417	Debtor(s)	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other: <u>Notice of Electronic Filing</u> (D.N.J. LBR 5005-1)

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: TBD

TBD  
\_\_\_\_\_  
Legal Assistant